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June 30, 2025

## VIA ECF

Hon. Justin T. Quinn, U.S.M.J. United States District Court District of New Jersey 402 E. State Street Trenton, New Jersey 08609

Re: PPREF/TP North Brunswick Industrial LLC, as assignee of 1735 Jersey Ave LLC

vs. Luxe Living Design, LLC

Civil Action No.: 3:24-cv-06175-MAS-JTQ

1735 Jersey Ave LLC and PPREF/TP North Brunswick Industrial LLC, as assignee of 1735 Jersey Ave LLC vs. Luxe Living Design, LLC, et al.

Civil Action No.: 3:24-cv-06168-MAS-JTQ

Dear Judge Quinn:

Pursuant to Your Honor's Text Orders, dated June 13, 2025, this joint letter is submitted by Plaintiff, PPREF/TP North Brunswick Industrial LLC, as assignee of 1735 Jersey Ave LLC ("PPREF") and 1735 Jersey Ave LLC ("1735 Jersey Ave"). Counsel for Luxe Living Design, LLC ("Luxe Living") declined to review or approve this letter, despite repeated requests. This letter is intended to supplement the Joint Status Letter, dated June 4, 2025. *See* ECF Nos. 66 and 68. Efforts to settle the case were unsuccessful. The parties remain far apart. We believe that it will be beneficial to move forward with discovery.

Respectfully Submitted,

## FOX ROTHSCHILD LLP

Attorneys for PPREF/TP North Brunswick Industrial LLC, as assignee of 1735 Jersey Ave LLC

By: <u>s/R. James Kravitz</u> R. James Kravitz, Esq.

(APPROVED AND AGREED)



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## **CLARK GULDIN ATTORNEYS AT LAW**

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By:

<u>s/Jonathan Ozarow</u> Jonathan A. Ozarow, Esq.